

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:
CERVECERIA MODELO, S.A. DE C.V. and	:
MARCAS MODELO, S.A. DE C.V.,	:
	: Civil Action No. 07 CIV 7998
Plaintiffs,	:
	:
-against-	:
	:
USPA ACCESSORIES LLC d/b/a CONCEPT ONE	:
ACCESSORIES,	:
	:
Defendants.	:
	:
-----X	:

**PLAINTIFFS' PROPOSED VOIR DIRE QUESTIONS**

Plaintiffs Cerveceria Modelo, S.A. de C.V. and Marcas Modelo, S.A. de C.V., through their undersigned attorneys, hereby submit the following proposed voir dire questions:

**Personal Background**

1. Where do you live?
2. What is your educational background?
3. What is your occupation?
4. Are you married?
  - (a) If yes, how is your husband/wife employed?
5. Do you have any children?
  - (a) If yes, how many?
  - (b) If yes, what are their ages?
6. What are your hobbies?
7. Where do you generally shop for clothes and other merchandise?

8. What types of television shows do you watch?
9. What types of magazines do you read?
10. Do you do any creative activities – art, drawing, web design?
11. Do you belong to any clubs, teams, or community organizations?
  - (a) If yes, please describe them.

**Litigation History**

12. Have you ever served as a juror before?
  - (a) If yes, please describe your jury service.
  - (b) What is a criminal or civil case?
  - (c) Did you serve as a foreperson?
  - (d) What was the result of the trial?
  - (e) Were you able to reach a verdict?
13. Have you ever been a party to a litigation?
  - (a) If yes, please describe.
14. Have you ever testified as a witness before?
  - (a) If yes, please describe.

**Relationship to Case**

15. Have you, or anyone you know, ever worked for or had any personal or business dealings with either the Plaintiff or Defendant corporations in this case?
  - (a) If yes, please describe.
16. Do you know any of the other prospective jurors here today?
  - (a) If yes, please explain.
17. Do you know Judge Baer?
  - (a) If yes, please explain.

18. Do you know Anna Gercas?
19. Do you know any of the attorneys or law firms in this case?
20. I am going to read a list of names of people who may be referred to or called as witnesses in this case. While not all of these potential witnesses will testify in this trial, we need to learn from you if you know any of them. Please raise your hand if you think you know anyone on this list and state how you know that person.

- (a) Jose Pares Guterrez
- (b) Jose Maria Arreola Viera
- (c) Carla Gavaldon Terres
- (d) Juan Fernandez
- (e) Carlos Fernandez Gonzalez
- (f) Jean Marie Ruffini
- (g) Jorge Perez
- (h) Ronald Vollmar
- (i) Sam Hafif
- (j) Bernie Hafif
- (k) Byron Cohen
- (l) Tara LaRosa
- (m) Gary St. Louis
- (n) Jack Gindi
- (o) Beth Schlansky
- (p) Steve Gerber
- (q) David Shaoul
- (r) Dana Tyskiewicz
- (s) Debra Medely

- (t) Cesar Hernandez
  - (u) David Espinoza
  - (v) Harvey Mallis
  - (w) Kristen Sperling
  - (x) Abraham Saka
  - (y) Javier Zavala
  - (z) Ricci Leonhard
  - (aa) Judith Wetsell
  - (bb) Greg Rush
  - (cc) Eric Pugh
  - (dd) Joe Rollins
  - (ee) Eric Rellosa
  - (ff) Beth Taylor
21. Are you familiar with Corona Extra or Corona Light beer?
- (a) If yes, on what is your familiarity based?
22. Are you familiar with the advertising campaigns for Corona Extra or Corona Light beer?
- (a) If yes, on what is your familiarity based?
  - (b) Do you have any opinion on the advertising campaigns,
23. Do you drink Corona Extra or Corona Light beer?
24. Do you like Corona Extra or Corona Light beer?
25. Do you shop at mass-merchandise stores such as Walmart?
26. Do you own any Corona-branded merchandise?
- (a) If yes, what?
  - (b) Where did you buy this merchandise?

**General**

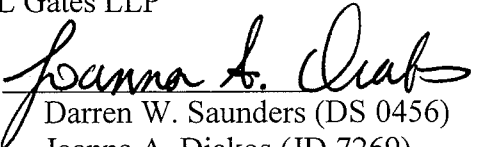
27. Are you familiar with the concept of a federally registered trademark?
28. Are you familiar with the purpose of a trademark?
29. Have you ever been involved in registering a trademark?
  - (a) If yes, please explain.
30. Do you think that trademarks have value?
31. Have you ever purchased fake “designer” merchandise, such as a watch or handbag?
32. Do you think it is wrong to purchase these items?
33. Is it wrong for the people to sell them?
34. Have you, your spouse, any member of your immediate family, or a close friend ever been a party to a contract or agreement they alleged was violated?
  - (a) On which side of the dispute were you or your spouse or your family member or close friend?
  - (b) What were the circumstances?
  - (c) What was the type of business?
  - (d) Did a lawsuit result?
  - (e) Did you feel the outcome was fair?
35. Have you ever owned or run a business?
  - (a) If yes, please describe the business.
36. Do you feel that you would be able to follow the judge’s instructions of law even if you disagree with his instructions or feel that the law ought to be otherwise?
37. Do you know of any reason that would prevent you from fairly considering the evidence in this case and reaching an impartial verdict? Please explain.

38. Do you know of any reason why you should not be a juror in this case? Please explain.

Dated: New York, New York  
August 11, 2008

Respectfully submitted,

K&L Gates LLP

By:   
Darren W. Saunders (DS 0456)  
Joanna A. Diakos (JD 7269)  
599 Lexington Avenue  
New York, NY 10022  
Tel.: (212) 536-3900  
Fax: (212) 536-3901

*Attorneys for Plaintiffs Cerveceria Modelo,  
S.A. de C.V. and Marcas Modelo, S.A. de C.V.*